

**Santos, Carmen**

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**From:** Conlan, Linda [Linda.Conlan@amec.com]  
**Sent:** Thursday, January 30, 2014 7:47 AM  
**To:** Santos, Carmen  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

That is correct.

Linda Conlan, PG  
Principal Geologist  
AMEC Environment & Infrastructure, Inc.

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**From:** Santos, Carmen [mailto:Santos.Carmen@epa.gov]  
**Sent:** Wednesday, January 29, 2014 1:15 PM  
**To:** Conlan, Linda  
**Subject:** PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Greetings Linda:

As I review the draft letter with modifications to the July 2, 2010 and July 1, 2011 EPA Approvals issued to Pechiney, my understanding is that concrete with PCBs above 1 mg/kg will not be used at any location within the Pechiney site (meaning the City of Vernon and Rio Tinto's portions combined). Please clarify my understanding is correct.

Thank you.

Sincerely,  
Carmen

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
Waste Management Division  
75 Hawthorne Street  
San Francisco, CA 94105  
Voice: 415.972.3360  
santos.carmen@epa.gov

*"Think left and think right and think low and think high. Oh, the things you can think up if only you try!"* Dr. Seuss

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**From:** Santos, Carmen  
**Sent:** Wednesday, January 29, 2014 12:18 PM  
**To:** 'Conlan, Linda'  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

This is regarding proposed modifications to the PCB approvals that EPA has issued for the Pechiney site in Vernon, California.

We met on January 23, 2014 to go over the recent finding of new PCB-contaminated soils during the below-ground demolition. We discussed the possibility of a "blanket approval" for these situations. However, in reviewing the language in Conditions C.7.c. and C.7.e. in EPA's July 2, 2010 conditional approval, cover the finding of PCB contaminated soils during demolition of below ground structures and management of PCB-contaminated soils during below-ground demolition, respectively. From EPA's standpoint, those Conditions are what EPA intended to be the approach to follow when new contamination is found during the below-ground demolition. Except for the 2-day time frame to notify EPA under Condition C.7.c. that Condition of approval will remain as established in the approval.

In reference to PCB-impacted soils at depths below 15 feet, please verify the basis for the 73.6 mg/kg total PCB concentration. Is this based on one sample collected from the excavation after removal of soils containing higher PCB concentrations? Or is the 73.6 an average concentration based on several discrete in situ soil removal verification samples? Please send the analytical results for Area C excavation. Please also verify if backfilling of the Area C excavation is still occurring this week of January 27, 2014.

My manager is still ill and I am revising the draft letter today.

Thank you for your courtesies.

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**From:** Conlan, Linda [<mailto:Linda.Conlan@amec.com>]  
**Sent:** Tuesday, January 28, 2014 1:52 PM  
**To:** Santos, Carmen  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Thank you for the update!

Linda Conlan, PG  
Principal Geologist  
AMEC Environment & Infrastructure, Inc.

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**From:** Santos, Carmen [<mailto:Santos.Carmen@epa.gov>]  
**Sent:** Tuesday, January 28, 2014 1:50 PM  
**To:** Conlan, Linda  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

Hope your day is going well.

My manager is out sick. I plan on having the letter ready for his signature on January 29, 2014.

Thank you.

Sincerely,  
Carmen

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
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**From:** Conlan, Linda [<mailto:Linda.Conlan@amec.com>]  
**Sent:** Friday, January 24, 2014 4:49 PM  
**To:** Santos, Carmen  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hi Carmen, Bill Adams' contact information is below.

William Adams  
President of Pechiney Cast Plate Inc.  
4700 Daybreak Parkway  
South Jordan, Utah 84095

Thank you,

Linda Conlan, PG  
Principal Geologist  
AMEC Environment & Infrastructure, Inc.

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**From:** Santos, Carmen [<mailto:Santos.Carmen@epa.gov>]  
**Sent:** Friday, January 24, 2014 4:13 PM  
**To:** Conlan, Linda  
**Subject:** RE: PCBs - Pechiney - Proposed Changes to the Conditional Approvals

Hello Linda:

I thank you, Calvin, and Gerald for meeting with me regarding the Pechiney site and specifically concerning Rio Tinto and AMEC's proposed changes to EPA's conditional approval of the TSCA PCB cleanup and sampling plans.

I have received your message with the proposed changes, which we discussed on January 23, 2014.

Please send me the contact at Rio Tinto and Pechiney to whom we may address our letter responding to your request attached below.

Thank you for your courtesies.

Sincerely,  
Carmen

Carmen D. Santos  
PCB Coordinator  
USEPA Region 9 (WST-5)  
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**From:** Conlan, Linda [<mailto:Linda.Conlan@amec.com>]  
**Sent:** Friday, January 24, 2014 12:32 PM  
**To:** Santos, Carmen  
**Cc:** Gerald Pepper ([gerald.pepper@gmail.com](mailto:gerald.pepper@gmail.com)); Hardcastle, Calvin  
**Subject:** PCBs - Pechiney - Proposed Changes to the Conditional Approvals  
**Importance:** High

Hi Carmen,

Thank you for meeting with us yesterday regarding the ongoing work at the Pechiney site and the status of activities. As a follow-up to our discussion, we are proposing the following changes to USEPA Conditional Approvals under 40 CFR 761.61(c):

- 1) **Modification to Use of Restricted Fill (Section A.1.a – Cleanup Level C-1; July 1, 2011 Conditional Approval Letter).** This condition allows crushed concrete containing PCBs at concentrations greater than 1 mg/kg but less than 3.5 mg/kg as backfill material. This material was proposed as backfill for the 4a/4b soil excavation. Our